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March 12, 2024

BY CM/ECF

The Honorable Leonard P. Stark
U.S. Court of Appeals for the Federal Circuit
717 Madison Place, NW
Washington, D.C. 20439

Re: *Crystalex International Corporation v. Bolivarian Republic of Venezuela*, D. Del.
C.A. No. 1:17-mc-00151-LPS and related case *Lovati v. Bolivarian Republic of Venezuela*, D. Del. No. 1:23-mc-340-LPS

Dear Judge Stark:

Plaintiffs Rudi Lovati (“Lovati”) and Alessandro Lucibello Piani (“Piani” and, together with Lovati, “Plaintiffs”) of the related case *Lovati v. Bolivarian Republic of Venezuela*, C.A. No. 1:23-MC-340-LPS (the “Lovati Matter”)¹ hereby submit, pursuant to Paragraph 3 of the Court’s Memorandum Order of October 11, 2023 (D.I. 738 of Crystalex Docket), this Supplemental Summary of Dates pursuant to which Plaintiffs confirm completion of certain of the Steps Leading to Participation in Sale. This submission supplements the summaries filed on October 16, 2023 (D.I. 29 of Lovati Docket) and November 2, 2023 (D.I. 33 of Lovati Docket) to advise of an additional step completed since the latter filing.²

* * * * *

¹ Citations to the docket of the Lovati Matter appear herein as “D.I. [#] of Lovati Docket.” A copy of this Summary of Steps will be filed on both the Crystalex Docket and the Lovati Docket.

² Plaintiffs’ October 16 summary confirms completion of Steps 1-4 with documentary support, while the November 2 summary confirms completion of Step 5 with documentary support.

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STEP 6. THE CLERK ISSUES TO THE UNITED STATES MARSHALS SERVICE (“MARSHALS”) THE WRIT OF ATTACHMENT *Fi. FA.*³

March 8, 2024. Pursuant to the Court’s March 7, 2024 Order directing the Clerk “to affix her original signature and seal on the proposed writs of attachment filed by … each Additional Judgment Creditor” (D.I. 1036 of Crystalex Docket) (D.I. 66 of Lovati Docket), on March 8, 2024, the Clerk did in fact issue the aforementioned Writ of Attachment *Fi. Fa.* a copy of which is enclosed as Exhibit 1.

* * * * *

STEP 7. THE U.S. MARSHALS SERVICE SERVES THE CREDITOR’S WRIT OF ATTACHMENT, PERFECTING THE WRIT AND ATTACHING THE SHARES OF PDVH OWNED BY PDVSA.

To be completed.

* * * * *

Counsel is available at the convenience of the Court or the Special Master should there be any questions or concerns regarding the foregoing.

Very truly yours,

/s/ Mackenzie M. Wrobel
Mackenzie M. Wrobel (#6088)

*Counsel for Rudi Lovati and
Alessandro Lucibello Piani*

Enclosures

CC: All Counsel of Record (via CM/ECF)

³ Plaintiffs’ October 16 summary confirms completion of Steps 1-4 with documentary support, while the November 2 summary confirms completion of Step 5 with documentary support.